

# EXHIBIT 11

**From:** William Quinn  
**Sent:** Thursday, September 7, 2023 11:27 AM  
**To:** Richard Mast  
**Cc:** D. Yerushalmi  
**Subject:** Re: Production of Documents - Quinn/USCCB

Dear Mr. Mast,

The USCCB's scope of work for the Department of State at Fort Pickett in 2021 did not include representative legal services. The services that might be categorized as "legal assistance" were limited to helping migrants access legal representation, but USCCB employees and contractors were not authorized to provide direct legal representation as part of their work for the USCCB.

It is our understanding that Martha Jenkins, an attorney, and Carolina Velazquez, a social worker, were providing social work support to the **Doe** family under the USCCB's contract with the Department of State in 2021. If Ms. Jenkins and the **Doe** family did form an attorney-client relationship outside of her work for the USCCB, she did not inform anyone at the USCCB of that relationship, nor did she indicate that any document she provided to Ms. Velazquez or USCCB staff was subject to privilege. Ms. Jenkins and Ms. Velazquez are the only custodians who maintained documents relevant to the subpoena.

We therefore have no reason to believe that any documents produced in response to the subpoena are subject to an attorney-client or work-product privilege.

Best regards,  
Will



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